

**TAB 20**

Designation Run Report

# Brantley, Eric - Plaintiff and Defense Combined Submission

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Brantley, Eric 11-27-2018

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Plaintiffs Affirmative Designations 00:22:25

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Defense Counter Designations 00:36:11

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Defense Completeness Counters 00:01:17

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Total Time 00:59:53



522:15 BY MR. PYSER:

522:16 Q. Do you know whether anyone at DEA also  
522:17 received ingredient limit reports?

522:18 A. The ingredient limit reports were sent to  
522:19 the DEA on a monthly basis.

522:20 Q. You talked a little bit about site visits  
522:21 and additional work you did beyond just reviewing the  
522:22 ingredient limit reports. It -- were there times  
522:23 when you made decisions as a result of site visits?

522:24 A. Yes. If -- if during a site visit it was  
522:25 deemed that they were doing, for instance,  
523:1 Internet -- they were associated with an Internet  
523:2 pharmacy, then I would make a recommendation to  
523:3 discontinue business with that -- or discontinue  
523:4 controlled substance shipments with that pharmacy and  
523:5 then report that pharmacy to Kyle Wright at the DEA.

523:6 Q. And to your knowledge, when you made a  
523:7 decision to discontinue business with a pharmacy, did  
523:8 Cardinal Health follow that recommendation?

523:9 A. Yes.

523:10 Q. And when you reported a pharmacy to the  
523:11 DEA, who did you send that information to?

523:12 A. I sent the -- an e-mail to Kyle Wright at  
523:13 DEA headquarters.

523:14 Q. Who -- who is Kyle Wright?

523:15 A. I don't remember his exact title, but I  
523:16 believe he may have been over the e-commerce section.  
523:17 But he was where registrants submitted such reports  
523:18 to the DEA.

523:19 Q. Was it your understanding that the purpose  
523:20 of sending ingredient limit reports to DEA was to  
523:21 comply with the DEA regulations for suspicious-order  
523:22 reporting?

523:23 A. Yes.

523:24 Q. So why did you conduct site visits and  
523:25 investigations of customers on top of the ingredient  
524:1 limit reports?

524:2 A. That was over and above the requirement.  
524:3 The requirement was to report the suspicious orders,  
524:4 and then based on the report I saw, I would actually

524:5 go out and investigate the pharmacies to actually  
524:6 report those pharmacies to the DEA as well, in  
524:7 addition to orders.

524:8 Q. Let's take a look at a document.

524:9 I'm showing you a document that's been  
524:10 marked Exhibit 34 in this deposition. It's a new  
524:11 exhibit.

524:12 (Cardinal-Brantley 34 was marked for  
524:13 identification.)

524:14 BY MR. PYSER:

524:15 Q. Just so we can see it, I'll put it in  
524:16 front of Exhibit 34, up on the Elmo.

524:17 What is Exhibit 34?

524:18 A. This is the Cardinal Health DEA compliance  
524:19 manual.

524:20 Q. And if you look at the -- the table of  
524:21 contents, does it cover several different areas of  
524:22 DEA compliance? It's a thick document, a couple  
524:23 hundred pages.

524:24 A. Yes.

524:25 Q. And if you look at Section 7 of the DEA  
525:1 compliance manual, is that section titled "Required  
525:2 Reports to DEA"?

525:3 A. Section 7?

525:4 Q. If you turn to Bates page ending 898 --

525:5 A. Oh, yes.

525:6 Q. -- of the table of contents.

525:7 A. I see it. I see it.

525:8 Q. So let's go together to Section 7.

525:9 And I'll give you the Bates number, which  
525:10 is going to be the number in the bottom right corner.  
525:11 It's going to be Bates ending 937.

525:12 And to your recollection, was this DEA  
525:13 compliance manual in effect during the time that you  
525:14 worked at Cardinal Health?

525:15 A. Yes.

525:16 Q. Okay. And specifically during the time  
525:17 period 2005 through '07 or '08, when you were working  
525:18 the anti-diversion area?

525:19 A. Yes.